



1. INTRODUCTION

The City of Santa Clara receives entitlement funding from two federal programs administered by the United States Department of Housing and Urban Development (HUD): Community Development Block Grant (CDBG) and Home Investment Partnerships Act (HOME). The purpose of these two programs is to benefit persons of low and moderate incomes by providing decent, affordable housing, public services, and community development. As an entitlement jurisdiction under both programs, the City is required to adopt a local Citizen Participation Plan to comply with provisions of 24 CFR Section 91.105.

The Citizen Participation Plan must provide for and encourage citizens to participate in the development of the Consolidated Plan, including the Annual Action Plans that are part of the five-year Consolidated Plan (CP) for the expenditure of federal funds, any substantial amendments to the CP, and the Consolidated Annual Performance and Evaluation Report (CAPER). The City is expected to take whatever actions are appropriate to encourage the participation of all its citizens in the development of plans and amendments, particularly those living in slum or blighted areas and areas where federal funds are proposed to be used, and including minority and non-English speaking persons and persons with disabilities.

2. OBJECTIVES OF THE CITIZEN PARTICIPATION PLAN

- A. To provide for and encourage citizen participation, with particular emphasis on participation by persons of low and moderate income who are residents of areas of slum or blight, residents of low and moderate income neighborhoods, and residents of areas in which federal entitlement funds are to be used.
- B. To make proposed plans for the use of federal entitlements funds available to persons, public agencies, and other interested parties. Information to be provided will include the amount of entitlements the City expects to receive (including program income), the range and nature of activities to be undertaken, the estimated benefit of those activities to low and moderate income persons, and the performance of those activities in providing such benefits.
- C. To conduct public hearings to obtain citizen views and comments during the development of the CP.
- D. To prepare and publish the proposed CP in a manner that allows citizens a reasonable opportunity to examine its contents and submit comments and to consider those comments before submitting the final CP to HUD.
- E. To consider any comments received by citizens, in writing or orally at the public hearings, in preparing the final CP and summarizing those comments in the submission to HUD.
- F. To provide citizens with reasonable notice and an opportunity to comment on substantial amendments to the CP, and to consider those comments prior to the submission to HUD.

- G. To provide citizens with reasonable notice and an opportunity to comment on the CAPER and to consider the comments prior to the submission of the report to HUD.
- H. To provide technical assistance to those individuals and groups who request assistance in developing proposals for funding assistance.
- I. To provide timely, written responses to written complaints and grievances related to the entitlement programs, applications, activities and/or reports. Responses will be provided within fifteen (15) working days where practical.
- J. To provide reasonable opportunity for persons with disabilities and persons with limited English proficiency to present their views and comments on the CP and its performance.
- K. To encourage the participation of local and regional institutions, the Continuum of Care, and other organizations (including businesses, developers, nonprofit organizations, philanthropic organizations, and community-based and faith-based organizations) in the process of developing and implementing the CP.

3. **IMPLEMENTATION OF THE OBJECTIVES--CITY COUNCIL**

- A. The City Council of the City of Santa Clara sets policies and priorities, and approves the activities undertaken with the City's federal entitlement program funds.
- B. Consistent with federal requirements, the City Council will:
 - 1) Conduct one public hearing prior to the publication of the Notice of Funding Availability and solicitation of proposed activity applications. The purpose of this public hearing will be to obtain the views of citizens and local and regional institutions, the Continuum of Care, and other organizations (including businesses, developers, nonprofit organizations, philanthropic organizations, and community-based and faith-based organizations) on housing and community development needs. Notice of this hearing will be published in one or more newspapers of general circulation, and posted on the City's website. Notice of the scheduled time and place of this public hearing will precede the hearing by not less than fifteen (15) calendar days.
 - 2) Conduct one public hearing prior to the development of the CP. The purpose of this public hearing will be to review activity proposals and to obtain the views of citizens and other organizations on those proposals. Notice of this hearing will be published in one or more newspapers of general circulation and posted on the City's website. Notice of the scheduled time and place of this public hearing will precede the hearing by not less than fifteen (15) calendar days.
 - 3) Conduct one public hearing prior to the annual submission of the CP to HUD. The purpose of this public hearing will be to obtain the views of citizens and other organizations on the draft CP. Notice of this hearing will be published in one or more newspapers of general circulation and posted on the City's website. Notice of the scheduled time and place of this public hearing and the availability of the draft must precede the hearing by not less than thirty (30) calendar days.

- 4) The City will conduct public hearings at locations and at times that are convenient to the public. It will provide reasonable accommodations and modifications in policies, procedures and/or practices, as necessary, to provide access for all individuals with a disability or with limited English proficiency.
- C. As required, City Council shall appoint members to and set the operating rules for the Neighborhood Conservation & Improvement Program Rehabilitation Loan Committee. The NCIP Loan Committee approves procedures, loans and terms for home improvement/rehabilitation loans for qualified low-income homeowners.

4. **IMPLEMENTATION OF THE OBJECTIVES--CITY STAFF**

- A. The Housing and Community Services Division, under the supervision of the City Manager's Office, has primary responsibility for the administration and coordination of the Citizen Participation Plan and the City's federal entitlement activities. The Deputy City Manager in the Housing and Community Services Division is responsible for the daily administration of that responsibility.
- B. The Deputy City Manager will maintain all records of the administration of the City's federal entitlement programs and the Citizen Participation Plan including: the Citizen Participation Plan, the Consolidated Plan, the federal funding application and the Consolidated Annual Performance and Evaluation Report. All promotional materials, records of hearings, citizen comments, activity applications, funding agreements, performance reports, evaluation reports, and other documents required by HUD shall be maintained for five (5) years after completion of the CAPER, or such longer period as required by city, state or federal statutes and/or regulations. Copies of regulations and issuances governing the programs, contracting procedures, environmental standards, labor standards, fair housing and equal opportunity standards, relocation provisions, and all other documents shall be maintained and available to the public at the Community Services Division office during normal working hours.
- C. The Deputy City Manager will provide to interested parties technical assistance such as:
 - 1) Information relating to the City's policies and procedures affecting the entitlement programs.
 - 2) Interpretation of HUD rules and regulations governing the entitlement programs.
 - 3) Development of specific project activities requested by citizens, non-profit organizations, or other organizations.
 - 4) Provision of relevant demographic or socio-economic data.
 - 5) Information regarding alternative funding sources for proposed activities ineligible for the entitlement programs.
 - 6) Information regarding the City's plans to minimize displacement of persons and to assist any persons displaced, as set forth in subsection K.

- D. The Deputy City Manager shall receive and investigate all written complaints regarding the federal programs and the Citizen Participation Plan and prepare a written response, within fifteen (15) working days where practicable.
- E. The Deputy City Manager will schedule all required public hearings and arrange for publication of required notices.
- F. As directed by City Council, the Deputy City Manager will prepare the draft CP, respond to all written and public hearing citizen comments received, and submit the final CP to HUD.
- G. The Deputy City Manager will publish a summary of the draft CP in a newspaper of general circulation and on the City's website, and distribute copies of the draft CP to the Central Park Library at 2635 Homestead Road in Santa Clara, the City Clerk's office, and other appropriate public places to ensure a wide dissemination of the information for public review. The City will also provide a number of free copies of the draft CP upon request. The draft CP will be available for public review for at least 30 days, prior to adoption.
- H. The Deputy City Manager will prepare the draft Consolidated Annual Performance and Evaluation Report (CAPER), and publish its availability for a 15 day public review and comment period in a newspaper of general circulation and on the City's website. The notice will include a list of locations at which the draft CAPER can be reviewed. All comments received will be considered and summarized in the final report prior to its submission to HUD.
- I. The Deputy City Manager will arrange for reasonable modifications in policies, procedures and/or practices, as necessary, to provide access for all individuals with a disability or with limited English proficiency. All public hearing locations are fully accessible by wheelchair and public transportation. People with impaired speech or hearing may call (408) 615-2490 through 711, the nationwide Telecommunications Relay Service. Sign language interpretation, translation into languages other than English, and interpretation for persons with visual impairments are available. Sign language or other interpretation services must be scheduled at least one week in advance of public hearings by calling 408 615-2490.
- J. The Deputy City Manager shall provide staff assistance to and schedule all meetings of the Neighborhood Conservation & Improvement Program (NCIP) Rehabilitation Loan Committee. Meetings are open to the public and posted on the City's website.
- K. It is the City's policy to avoid displacement and relocation. However, in the event that any residential displacement and relocation occurs in the course of carrying out an entitlement activity, The Deputy City Manager will ensure compliance with the requirements of 49 CFR Part 24, the Uniform Relocation Assistance and Real Property Acquisition Policies, as may be amended.
- L. The Deputy City Manager will ensure that the Citizen Participation Plan is being followed and will amend the adopted Plan whenever a change in the public participation process is proposed. A Citizen Participation Plan Amendment will require a published 30-day public review notice and a public hearing on the amendment. The public review period will be noticed on the City's website and published in a newspaper of general circulation.

- M. The Deputy City Manager will explore alternative public involvement techniques and quantitative ways to measure efforts that encourage citizen participation in a shared community vision and in the review of program performance through the use of focus groups and the internet.

5. **IMPLEMENTATION OF THE OBJECTIVES--NCIP REHABILITATION LOAN COMMITTEE**

- A. The NCIP Rehabilitation Loan Committee shall consist of four (4) members, three from the community appointed by City Council, and one member from the City Council.
- B. The NCIP Rehabilitation Loan Committee will meet once each quarter to review housing rehabilitation loan applications and determine the scope of work and terms of financial assistance for rehabilitation loan activities.
- C. The NCIP Rehabilitation Loan Committee advises City on NCIP program policy.

6. **IMPLEMENTATION OF THE OBJECTIVES--PUBLIC PARTICIPATION**

- A. The general public may participate in the various stages of the program by attending the City Council public hearings and the NCIP Rehabilitation Loan Committee meetings. They may also express their views and comments directly to the Deputy City Manager. Citizens can access program information kept in the Community Services Division and City Clerk offices.
- B. Any citizen may make an objection to a submitted application. Persons wishing to object to the approval of an application may make the objection known to the Deputy City Manager and/or HUD at the following addresses:
 - 1) Deputy City Manager
Division of Housing and Community Services
City of Santa Clara
1500 Civic Center Drive
Santa Clara, CA 95050
 - 2) U.S. Department of Housing & Urban Development
Office of Community Planning and Development-9AD
600 Harrison Street, 3rd Floor
San Francisco, CA 94107-1387
- C. HUD will consider objections made only on the following grounds: The City's description of needs and objectives is plainly inconsistent with available facts and data; the activities to be undertaken are plainly inappropriate to meeting the need and objectives identified by the applicant; the applicant does not comply with the requirements of applicable laws or regulations; the application proposes activities which are otherwise ineligible; the approved Citizen Participation Plan process was not followed. Objections should identify the requirements not met and/or the inconsistent facts or data. HUD will consider objections submitted at any time. However, objections to the Consolidated Plan application should be submitted within thirty (30) days of the published date of submittal of the CP to HUD.

7. CONSOLIDATED PLAN AMENDMENT PROCESS

- A. The CP sets forth the City's plan for using federal entitlement funds. During the program year, changes to the CP fall into two categories: Substantial amendments requiring citizen participation, City Council approval and submission to HUD; and Minor amendments requiring City Council approval.
- B. A substantial amendment (24 CFR 91.505) is required when proposed changes would:
 - 1) Implement an activity not described in the approved CP.
 - 2) Change allocation priorities or method of distribution of funds.
 - 3) Change the purpose, scope, location or beneficiaries of an approved activity.
- C. To accomplish a substantial program amendment, the Deputy City Manager will prepare documentation outlining the proposed changes. This document will contain justification for making the proposed changes, revised needs statement, short-term objectives, long-term objectives, activity description, and budget transfer information, as necessary.
- D. The public will be given a 30-day period to comment on the proposed substantial amendment prior to the public hearing where it will be considered by the City Council. A notice of the 30-day public comment period and public hearing will be published in a newspaper of general circulation and on the City's website. All comments received will be given due consideration.
- E. The Deputy City Manager will submit a copy of each substantial CP amendment to HUD after approval by City Council. The document will include a summary of any comments received from the public.
- F. Minor CP amendments are any changes to the CP that do not meet the criteria for a substantial amendment. The procedure for making a minor amendment are the same as that for a substantial amendment except that no public hearing or newspaper notice is required, only City Council approval is required, and submittal of a minor amendment to HUD is not necessary.

Citizen Participation Plan Amendment

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